

DDA

STATINTL

ODP-0-997
29 JUL 1980

MEMORANDUM FOR: Chief, Regulations Control Division, ISS

FROM : [REDACTED]
STATINTL Chief, Management Staff, ODP

SUBJECT : Proposed Revision of HR [REDACTED] Automatic
Data Processing (ADP) Management (Job
#8345) Draft E

REFERENCE : Your Memo, dtd. 16 July 1980, Same Subject

STATINTL

1. Please find attached Draft E of proposed HR [REDACTED]
We have included those revisions we find acceptable from
the comments received on Draft D, the reference. Also
attached are our reasons for acceptance or rejection and
a summary of the actions taken referenced to the draft
paragraphs.

2. Any action you can take to put this regulation
in the record would be appreciated. It has been over three
years since we started.

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Attachments: a/s

ODP/MS/RFF:jal/(5937) (25July1980)

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MANAGEMENT

STATINTL

HR [REDACTED]

15. AUTOMATIC DATA PROCESSING MANAGEMENT

SYNOPSIS. This regulation prescribes ADP (automatic data processing) management policy and responsibilities. Definitions of major ADP categories are included for common reference.

a. GENERAL

(1) Public Law 89-306 dated 30 October 1965, 40 U.S.C. 759, is the basic law from which all policies, regulations, and guidelines for Government-wide ADP procurement and management are derived. The intent of the law is to provide for the economical and efficient purchase, lease, maintenance, operation, and utilization of automatic data processing equipment by Federal departments and agencies. Central to administering the law within Federal departments and agencies are long range ADP planning, adequate justification of ADP resources, review of utilization, and competitive procurements for ADP equipment, software, and services.

(2) This regulation does not apply to the ADP systems or networks that are used exclusively for telecommunications service. Such systems or networks are controlled by pertinent national policies and regulations.

b. DEFINITIONS

(1) "'Automatic data processing equipment (ADPE)'" means general purpose, commercially available, and mass-produced automatic data processing components and the hardware systems built from them regardless of size, capacity, or price that are designed to be applied to the solution or processing of a variety of problems or applications. ADPE does not include equipment specially designed, as opposed to configured, for a specific application that precludes future use of the equipment for the solution of a variety of problems or the processing of other applications.

(2) "'Automatic data processing (ADP)'" includes those activities that are inseparable from the operations of ADPE. Examples are ADP systems analysis and design, programming, ADP training, and maintenance of ADPE.

(3) "'ADP personnel'" are those individuals connected with ADP or ADP-related support functions (e.g., ADP management officials and systems development, applications development, and operations personnel). Included are personnel from ADP user organizations principally assigned to ADP support functions in the user organization. However, personnel who simply use ADP incidental to the performance of their primary function are not considered ADP personnel.

(4) ''Software'' encompasses all programs and routines such as compilers, assemblers, utilities, subroutines, and data base management systems used on ADPE.

(5) ''ADP resources'' include ADPE, ADP personnel, software, and data communications necessary for the utilization of ADPE.

c. POLICY

It is Agency policy to manage and administer its ADP activities in a cost-effective manner that is responsive to Agency needs and adheres to all applicable Federal laws, regulations, and guidelines.

d. RESPONSIBILITIES

(1) The Executive Committee is responsible for:

(a) Approving ADP projects, whether supported by ODP or with component-budgeted resources, in which the ADP resources will exceed \$250,000 in annual or cumulative costs.

(b) Reviewing major ADP capital investments included in the Agency's Program Plan before submission to the Resource Management Staff each year.

(c) Establishing strategic objectives for the Agency's use of ADP and tracking progress toward achieving them.

(2) Deputy Directors and Heads of Independent Offices are responsible for:

(a) Ensuring that proposed acquisitions of ADP resources are justified as necessary to carry on essential activities and that procurement of these resources will be competitive to the maximum extent practicable.

(b) Ensuring that proposed ADP applications are reviewed for compliance with the Privacy Act (5 U.S.C. 552a) and Executive order constraints with respect to storage and retrieval of information concerning U.S. persons and, if necessary, coordinating with the Office of General Counsel and other offices as appropriate before approving the application.

(c) Advising the Director of Data Processing promptly of new ADP support requirements so they can be evaluated and included in the plans and programs of the Office of Data Processing.

(d) Coordinating with ODP any plan or proposal that would establish ADP functions such as systems analysis, software development, computer operations, or ADP training in other components.

(e) Submitting requirements and costs for ADP resources in annual budgets and assisting ODP in the preparation of ODP-supported project reports for the Executive Committee review.

(f) Obtaining ODP concurrence in plans and proposals for ADPE, software, or contract services that involve any of the following:

(1) Procurement of ADPE that includes a CPU (central processing unit) regardless of cost.

(2) Upgrading or expansion of installed ADPE when the additional annual rental cost is \$50,000 or more or when the additional purchase cost is \$150,000 or more.

(3) Procurement of ADP system design, programming, or other services (excluding equipment maintenance) when the annual cost is \$50,000 or more.

(g) Consulting with the Office of Logistics on any planned ADP procurement, regardless of dollar value, prior to initiating discussions with potential suppliers.

(h) Reviewing ADP service charges as reported by ODP to determine the cost effectiveness of ADP projects and annually revalidating ADP service requirements.

(i) Reporting to ODP information on ADPE and ADPE personnel for inclusion in the Agency's ADP Management Information System.

(j) Appointing an officer to act as the Directorate or Independent Office ADP Control Officer, and directing the appointment of component ADP Control Officers as appropriate.

(3) The Comptroller is responsible for:

(a) Approving increases in projected costs for Executive Committee-approved, ODP-supported ADP projects which exceed the initial authorization by more than 10 percent, and for component-budgeted ADP projects which exceed the initial authorizations beyond the reprogramming authority of the Deputy Directors.

(b) Advising ODP of ADPE, software, or ADP services acquisitions projected in Agency component budget submissions.

(4) Directorate, Independent Office, and component ADP Control Officers are responsible for administering ADP matters within their area including:

- (a) Reviewing ADP service or procurement requests before these requests are submitted to ODP.
- (b) Reviewing and tracking ODP Project Resource Information System (PRISM) accounting reports.
- (c) Initiating PRISM project records for new ADP activities and changing existing PRISM project records when applicable.
- (d) Verifying ADP user names and distributing ODP user passwords.
- (e) Reporting and coordinating resolution of ADP security breaches with the ODP Security Officer.
- (f) Ensuring that all component ADP systems are in compliance with existing security regulations and procedures.
- (g) Validating terminal requests, and user access requests.
- (h) Ensuring that ADP users are trained to use ODP services and are aware of all applicable security regulations and procedures.

(i) Informing ODP of surplus ADPE for possible reutilization in other Agency components.

(5) The Director of Data Processing is responsible for:

(a) Providing a central computer service to satisfy ADP requests from any Agency component and to satisfy intelligence community requirements as assigned.

(b) Reviewing plans including initial systems and revalidation studies and concurring in formal proposals by Agency components for procurement of ADPE, software, or contract services that meet the criteria described in paragraph d(2)(f) above before procurement action is taken.

(c) Formulating and promulgating policies and guidelines relative to the justification, use, and management of ADPE, software, and services.

(d) Reporting annually to the Executive Committee on the state of ODP, its ability to satisfy current year requirements for ADP support, and its long term plans.

(e) Maintaining a current copy of all Federal Information Processing Standards (FIPS), coordinating Agency comments on proposed FIPS, and promulgating Agency guidelines in the use of FIPS.

(f) Maintaining a detailed inventory of Agency ADPE and a summary of the Agency's total ADP skills and ADP costs.

(g) Maintaining a system to account for the use of ODP ADP resources by user components.

(h) Developing and conducting ADP training programs on ODP computer systems and services to meet Agency requirements.

(i) Assignment of user identification and passwords.

(6) The Office of Security is responsible for developing security policy for ADP systems and for advising and coordinating with other Agency components in the establishment of security standards and procedures for Agency ADP facilities and activities.

(7) The Office of Communications is responsible for the provision of all communications support necessary between and among decentralized ADPE, and for the establishment, execution, and enforcement of communications

security (COMSEC) policies and programs for the Agency ADP systems and networks.

(8) The Office of Logistics is responsible for procuring ADPE, software, services, and supplies, except as otherwise specifically delegated by the DCI, and issuing guidelines on ADP procurement. The Office of Logistics is responsible for providing the utilities and computer room facilities required by ADPE.

SUMMARY

<u>Paragraph</u>	<u>Page</u>	<u>Action</u>	<u>Suggester/Component</u>	<u>Comment</u>
a. (1)	1	Reject	OL	
a. (1)	1	Accept	OGC	
a. (2)	2	Reject	OL	
b. (1)	2	Reject	OL	
b. (3)	2	Reject	OL	
b. (5)	3	Reject	OL	
d. (2) (a)	4	Reject	OL	
d. (2) (b)	4	Accept	OGC	
d. (2) (f) (3)	5	Accept	NFAC	
d. (2) (f) (4)	5A	Reject	OL	New paragraph
d. (2) (f) (5)	5A	Reject	OL	New paragraph
d. (3) (b)	7	Reject	OL	
d. (4) (d)	7	Reject	OS	
d. (4) (h)	8	Accept	OS	Add new d. (5) (i)
d. (4) (i)	8	Reject	OS	Not necessary (See D(5) (i))
d. (4) (j)	8	Reject	OS	Not necessary (Redesignation)
d. (5) (b)	8	Accept	OL	
d. (5) (i)	9	Reject	OL	New
d. (5) (j)	9	Reject	OL	New
d.5 (i)	9	Accept	OS/ODP	New paragraph

The comments received from OGC, OL, OS and NFAC are listed below in the order of the organization of the paper. Each comment is not reproduced; only the reason for acceptance or rejection is given.

- a. (1) Accept the inclusion of the U.S.C. citation from OGC for precision.
- a. (1) Reject the suggestion from OL. The authority of GSA over the Agency with regard to the delegation of procurement authority is not central to the Agency management of ADPE. The original section was removed at the request of the Inspector General as a part of an effort to clarify Agency regulations. In view of the 1947 Act and the authorities given the DCI, citation of GSA authority is not necessary. This reason also applies to all of OL's comments concerning CFR.
- a. (2) Reject OL suggestion-same as a. (1).
- b. (1) Reject OL suggestion. We believe this is an unnecessary elaboration for the purposes of this regulation. The present wording is a definition approved

by the EXCOM, and does not contradict any definition used by GSA or other such bodies.

- b. (3) Reject OL suggestion. This definition is for ODP accounting purposes. Comment misses the reasons for definition.
- b. (5) Reject OL suggestion. Comment does not take into account purpose of definition in conjunction with ODP responsibilities.
- d. (2) (a) Reject OL suggestion. This is a Deputy Director responsibility, and we do not believe they need this level of detail to manage.
- d. (2) (b) Accept OGC suggested citation of U. S. Code for clarity.
- d. (2) (f) (3) Accept NFAC suggestion of dollar figure of \$50,000 as a current reasonable threshold.
- d. (2) (f) (4) Reject new paragraph suggested by OL. ODP does not review maintenance costs.

- d.(2)(f)(5) Reject new paragraph suggested by OL.
ODP does not review this level of software.
- d.(3)(b) Reject OL suggestion, OL does not have this responsibility or function.
- d(4)(d) Reject OS suggestion as too detailed.
Will be covered in new paragraph d.(5)(i).
- d.(4)(h) Accept OS suggestion, but added to paragraph d.(4)(g).
- d.(4)(i) Reject OS suggestion. Not necessary, in view of d(4)(k).
- d.(4)(j) Same as d.(4)(i).
- d.(5)(b) Accept OL suggestion. Reasonable, adds to understanding.
- d(5)(i) Reject OL suggestion for a new paragraph.
Remote terminal equipment is part of central computer service. Remote is a "how", not a "what".
- d.(5)(j) Reject OL suggestion for a new paragraph.
The suggestion is not an ODP function for the Agency. It is a component responsibility.
- d.(5)(i) New paragraph, partially suggested by OS.
Paragraph reads "Assignment of user identification and passwords."